

Internal Audit Report

Maricopa Integrated Health System Maricopa Health Plan January 2001



Internal Audit Department

301 W Jefferson • 10th Floor • Phx • AZ • 85003 • (602) 506-1585 • Fax (602) 506-8957



January 30, 2001

Janice K. Brewer, Chairman, Board of Supervisors Fulton Brock, Supervisor, District I Don Stapley, Supervisor District II Andrew Kunasek, Supervisor, District III Mary Rose Wilcox, Supervisor, District V

We have completed our review of the Maricopa Health Plan (MHP). This audit was performed in accordance with the Board approved audit plan. Deloitte & Touche LLP was contracted to review and edit the final report. Areas identified needing improvement, along with recommended corrective actions, are detailed in the report. The highlights are:

- MHP is projecting small profit margins for FY00 through FY02 on a stand alone basis. MHP should analyze the cost-benefits of continuing the MHP program by considering the financial impact on other health care system components.
- Between 1994 and 2000, MHP's enrollment numbers declined by 25% and its market share declined by 4.4%. Enrollment began to rise during 1999 and 2000. MHP should continue to develop strategies for increasing enrollment.
- MHP has set its capitation rates lower than competing plans in several cases, negatively impacting revenue per member, in order to gain enrollment. Care must be given to ensure that capitation rates provide for adequate margins.
- MHP utilizes a significant number (33%) of non-contracted providers, which negates some of the advantages of using contracted providers. MHP should implement procedures to increase its members' usage of County facilities, or other contracted providers, in order to reduce its financial risk.

Attached are the report summary, detailed findings, recommendations, and MHP's response. If you have questions or wish to discuss items presented in this report, please contact Eve Murillo at 506-7245.

Sincerely,

Ross L. Tate County Audito

Ron L. Fate

Table of Contents

Executive Summary	1
Introduction	2
Detailed Information	6
Appendix	17
Department Response	20

Executive Summary

Profitability (Page 6)

The Maricopa Health Plan (MHP) has projected small profit margins for Fiscal Year (FY) 00 through FY02 on a stand alone basis. MHP should analyze the cost-benefits (financial, non-financial, and intangible) of continuing the MHP program by considering the financial impact on other health care system components.

Enrollment and Market Share (Page 9)

Between 1994 and 2000, MHP's enrollment numbers declined by 25 percent and its market share declined by 4.4 percent. Enrollment began to rise during 1999 and 2000. The overall enrollment decrease during 1994 to 2000 appears to be due to enrollees choosing other plans, by a significant margin. MHP should continue to analyze the causes for membership and market share declines and develop strategies to increase enrollment.

Capitation (Revenue) Rates (Page 12)

MHP has set its capitation rates lower than the competing plans in several cases, negatively impacting revenue per member, in order to gain enrollment. When implementing strategies to increase enrollment and market share MHP should give care to ensure that capitation rates provide for adequate margins.

Non Contracted Providers (Page 15)

Our review of six months of MHP medical claims expenses showed that MHP is utilizing a significant number (33%) of non-contracted providers, which negates some of the advantages of using contracted providers. MHP should implement procedures to increase its members' usage of County facilities, or other contracted providers, in order to reduce its financial risk.

Introduction

Background

The Arizona Health Care Cost Containment System (AHCCCS) is Arizona's Medicaid program, which also functions as Arizona's program for persons who do not qualify for Medicaid. AHCCCS contracts with health plans, such as Maricopa Health Plan (MHP), to manage the program. The program emphasizes cost containment through preventative care, rather than emergency care.

AHCCCS Capitation Rates

Health plans bid for an AHCCCS contract by submitting proposed capitation rates (fixed per member, per month revenue rate for each member category/group). AHCCCS evaluates each rate proposal against actuarially predetermined rate ranges. AHCCCS determines whether bids are too high (i.e., above the actuarial range) or too low (unable to deliver quality service). Health plans must be careful when formulating rate bids because the plans risk financial loss if their members' medical costs exceed AHCCCS' established monthly capitation payments.

AHCCCS Evaluates and Monitors Health Plans

In addition to evaluating rate bids, AHCCCS evaluates how the bidding health plans will meet financial and operational requirements, ensure quality service delivery, and provide a sufficient provider network. After awarding a contract, AHCCCS monitors each plan's compliance with contract performance standards.

Health Plan Competition

The six active Maricopa County area AHCCCS Acute Health Plans are:

- Maricopa Health Plan (MHP)
 CIGNA
- APIPAMercy Care
- Phoenix Health Plan
 Health Choice

Major AHCCCS Medicaid Eligibility Groups:

The Medicaid assistance member categories are:

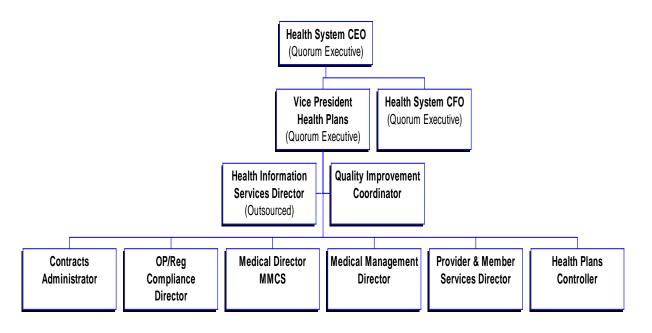
- Temporary Assistance to Needy Families (TANF), TANF-related groups
- The Sixth Omnibus Budget Reconciliation Act (SOBRA) categories
- Persons eligible for Supplemental Security Income (SSI) and SSI-related groups, as determined by the Social Security Administration.

State Funded (Non-Medicaid) Groups

The indigent health care program (a.k.a. "the State-funded program") is funded entirely with State and County funds to provide services for persons who do not qualify for Medicaid. The four State-funded eligibility categories are:

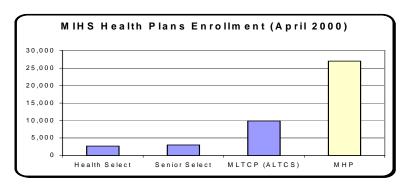
- Medically Needy/Medically Indigent (MNMI): As of July 1, 1998,
 MNMI's comprised 93 percent of the State-funded AHCCCS enrollment.
- Eligible Low Income Children (ELIC)
- Eligible Assistance Children (EAC)
- State Emergency Services (SES).

Maricopa Integrated Health Systems (MIHS) Health Plans Organizational Structure

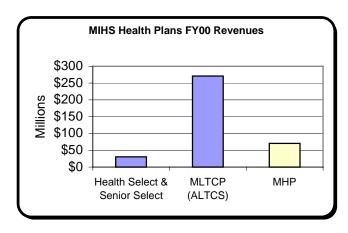


MIHS' Four Health Plans Comparison

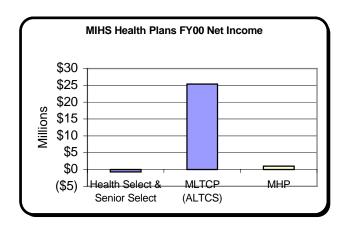
Enrollment information for MIHS' four health plans:



FY00 year-end revenues:



FY00 year-end net income:



MIHS Strategic Plan

MIHS' strategic plan elements that relate to MHP are:

- Produce sufficient financial results to meet the operational needs and capital required to support the goals and objectives of MIHS
- Position MIHS to be the health system provider of choice through exceptional customer service.

Compliance with Laws and Regulations

AHCCCS regulations are incorporated into the AHCCCS contract "Performance Areas" section. AHCCCS annually performs a compliance review of:

- Administration and Management
- Member Services
- Delivery System (Provider Network)
- Medical Management.

Program Benefit

Maricopa County is no longer mandated to operate the County's AHCCCS acute program. As previously mentioned, MHP is one of six competing Maricopa County area AHCCCS acute plans. If the County discontinued operating MHP, the other five plans would absorb MHP's members. The County chooses to operate the program because:

- MHP has shown profitability (FY96 through FY99)
- According to MIHS calculations, the Maricopa Medical Center derives approximately \$5 million in net income from MHP.

Scope

The scope of this review was limited to determine the following:

- Compliance with laws and regulations
- Effective program operations
- Validity and reliability of data
- Safeguarding of resources.

The audit report was reviewed, edited, and presented to MIHS by an outsourced audit firm. The audit was conducted in accordance with government auditing standards.

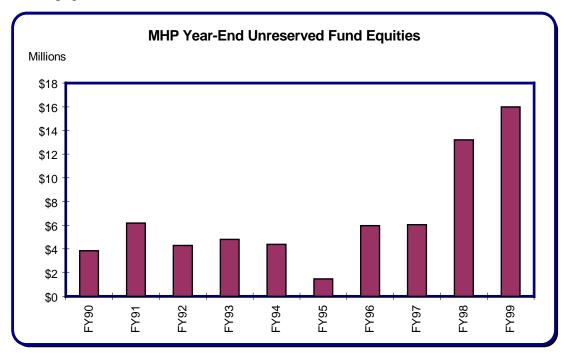
Issue 1 Profitability

Summary

The Maricopa Health Plan (MHP) has projected small profit margins for Fiscal Year (FY) 00 through FY02 on a stand alone basis. MHP should analyze the cost-benefits (financial, non-financial, and intangible) of continuing the MHP program by considering the financial impact on other health care system components.

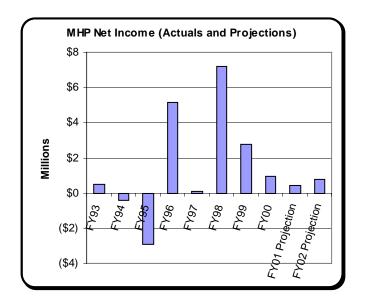
Fund Balance

MHP's fund equity exceeds AHCCCS reserve requirements, and is generally strong, as shown in the chart below. As a result of strong fund equity, MHP has received large interest earnings for the last several fiscal years (see table at bottom of next page).



MHP Net Income

MHP net income has declined significantly since FY98. MHP projects small profitability margins through FY02:



MHP net operating income dropped 73 percent between FY98 and FY99, and another 102 percent between FY99 and FY00. A comparison of net operating income to revenues shows a low rate of return by industry standards:

МНР	FY'98	FY '99	FY00	FY01 Projection (Mid-Level)	FY02 Projection (Mid-Level)	
Revenues	\$57,186,336	\$64,235,678	\$70,552,611	\$76,677,649	\$80,826,412	
Net Operating Income without Interest Earnings	\$ 6,659,891	\$ 1,828,506	(\$ 45,222)	(\$ 578,841)	(\$ 267,823)	
Interest Income	\$ 524,576	\$ 965,218	\$ 1,020,044	\$ 1,001,707	\$ 1,031,758	
Net Operating Income With Interest Earnings	\$ 7,184,467	\$ 2,793,724	\$ 974,822	\$ 422,866	\$ 763,936	
Net Income to Revenue	12%	3%	0%	-1%	0%	

Note: \$1 million of interest earnings is assumed for FY01 & FY02.

As shown by the table on the preceding page, MHP's net operating income dropped from \$1.8 million in FY99 to (\$45,222) in FY00. The following factors appear to have contributed to MHP's low profitability:

- Fewer clients attracted through choice than other plans (see Issue 2, page 9)
- Comparatively low rates (See Issue 3, page 12)
- Large market share of historically unprofitable MNMI members
- Provider network weaknesses (see Issue 4, page 16).

Recommendation

MHP management should:

- A. Produce a five-year financial projection (FY01-FY05)
- B. Analyze the cost-benefits (financial, non-financial and intangible) of continuing the program, including impacts to other parts of the health system.
- C. Consider outsourcing the cost-benefit analysis to an independent consultant
- D. Report the results of the cost-benefit analysis to the County Administrative Officer.

Issue 2 Enrollment and Market Share

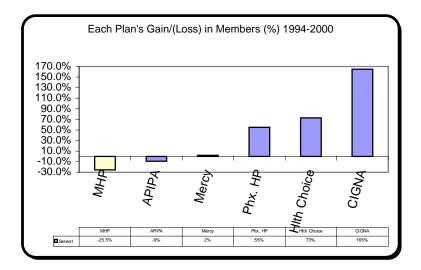
Summary

Between 1994 and 2000, MHP's enrollment numbers declined by 25 percent and its market share declined by 4.4 percent. Enrollment began to rise during 1999 and 2000. The overall enrollment decrease during 1994 to 2000 appears to be due to enrollees choosing other plans, by a significant margin. MHP should continue to analyze the causes for membership and market share declines and develop strategies to increase enrollment.

Enrollment Trend

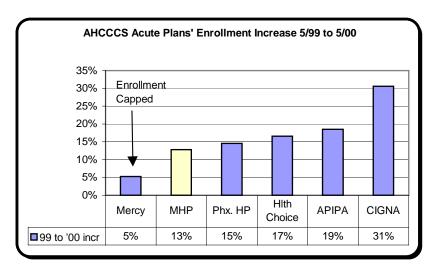
Growth in enrollment and market share indicate health plan viability. Health plans grow when members choose them or when members are automatically assigned. An analysis of MHP and the five other local area AHCCCS acute plans shows that MHP enrollment declined 25 percent between 1994 and 2000. NOTE: enrollment increased 13 percent between 1999 and 2000 (Appendix Table A-1).

Of the six active plans, MHP sustained the largest membership decrease during 1994 to 2000 (refer to graph below). (NOTE: CIGNA's large growth is partly due to the fact that its plan started in 1993/1994.)



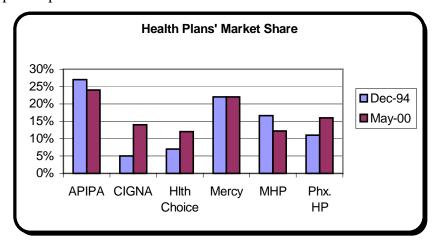
Recent Enrollment Trend

All six plans show enrollment increases between 1999 and 2000. MHP enrollment growth was smaller than the other five plans except Mercy Care, and as a result MHP lost some market share. (NOTE: Mercy Care requested that its enrollment be capped for three months.)



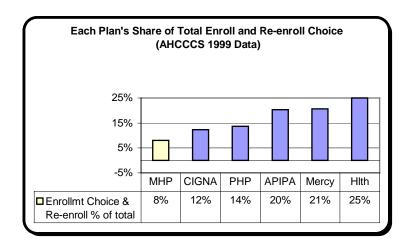
Market Share

MHP market share declined 4.4 percent between December 1994 and May 200000, while the other five plans' market share increased by 3 percent on average. The following chart compares MHP's market share trend with its five competitor plans:



Enrollees' Choice

MHP's enrollment growth and market share are low because enrollees have chosen other plans by a significant margin. It should be noted that membership growth between 1999 and 2000 did increase by approximately 13 percent (Appendix Table A-1):



Potential Causes of Low Enrollment Choice

Although determining precisely why enrollees choose other plans is difficult, enrollee surveys give some indications. A 1999 Maricopa County Research and Reporting department survey found that low satisfaction scores related to:

- Office wait time
- Pharmacy wait time
- Appointment wait time
- Location of clinic or office.

MIHS' December 1998 survey of 42 dis-enrolling members showed that 36 mentioned having to wait too long and 31 mentioned having to travel too far for appointments. MHP's 1998 marketing analysis found fewer doctors to be in the MHP regular network than in other plans' regular networks. A network size disadvantage could explain long waits and appointment unavailability.

Recommendation:

MHP should improve strategies:

- A. To increase enrollment choice
- B. To increase network size and appointment availability.

Issue 3 Capitation (Revenue) Rates

Summary

MHP has set its capitation rates lower than the competing plans in several cases, negatively impacting revenue per member, in order to gain enrollment. When implementing strategies to increase enrollment and market share MHP should give care to ensure that capitation rates provide for adequate margins.

Rate bids

Competing health plans submit capitation (revenue) rate bids to AHCCCS in order to secure an AHCCCS contract. The most recent competitive rate bid occurred in October 1997 to secure a 5-year contract. AHCCCS established an unpublished rate range (high and low). If a plan's rate bid exceeded the top of the range, AHCCCS adjusted the rate bid downward to the range mid-point. If a plan's rate bid was below the bottom of the range, AHCCCS brought it up to minimum. During the contract period, AHCCCS may adjust a member category rate if all plans are found to be losing money in that particular category. NOTE: AHCCCS has recently made MNMI category upward adjustments.

MHP's Low Rates

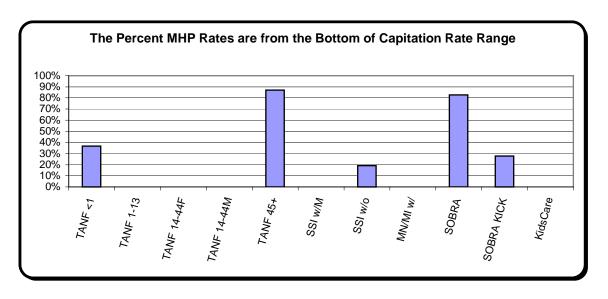
MHP's current rate structure appears to be low compared to competing plans participating in the program. We tested MHP rates by substituting competitor rates with MHP's rates within each client category. We found that:

- MHP's 9/95-10/97 rate structure was higher than competitors' average rate
- MHP's 10/97-5/00 rate structure was lower than competitors' average rates.

Testing showed that replacing MHP's October 1999 rates (set October 1997) with any of its competitors' rates would have generated more revenues. Depending on which competitors' rate structure was substituted, MHP would have realized between \$300,000 to \$3.6 million more revenues. How MHP enrollment numbers, within member categories, would have been affected by higher category rates is not clear.

The chart on the following page shows how MHP rates fare within each client category (Kids Care categories are combined). Bars show the percentage that MHP rates exceed the bottom of the range. MHP's TANF 45+ and SOBRA rates score relatively high, however, MHP's enrollment is small within these two categories (March 2000 TANF 45+ enrollment was under 200 and SOBRA

enrollment was approximately 1,500). The absence of a bar indicates that MHP's rate is at the bottom of that category's range.



Correlation Between Low Rates and Losses within Categories

A review of MHP FY99 financial data shows a correlation between low MHP capitation (revenue) rates in certain member categories and MHP financial losses in these categories (teal ink). MHP FY99 financial statements show the following losses (shown in red) by category:

MHP FY99 Net Income By Category							
MNMI:	(\$ 153,661)						
SSI w/Medicare:	(754,069)						
TANF 1-13 M/F:	(3,675,133)						
SOBRA KICK FPS:	(47,458)						
KidsCare 14-18M:	(12,621)						
SSI without Medicare	1,887,041						
Sobra MOMS	938,400						
TANF <1	2,920,965						
TANF 14-44F	1,527,615						
TANF 14-44M	2,436						
TANF 45+	63,041						
KidsCare <1	10,261						
KidsCare 1-13	57,870						
KidsCare 14-18F	29,037						
TOTAL	\$ 2,793,724						

MHP's low rate structure, set in 1997, results in lower revenues and lower net income if enrollment is constant. According to MHP staff, MHP set low rates in order to win the 1997 AHCCCS contract bid. AHCCCS assesses bids on two criteria: the plan's rate bid and the plan's performance scores. MHP staff state

that the plan's 1997 performance scores were low and MHP compensated by setting low rates in order to procure the bid.

Low Rates Lead to Larger Member Automatic Assignment

Health plans may set certain rates low intentionally in order to garner higher numbers of enrollees via AHCCCS' automatic assignment of those members. (AHCCCS devised an algorithm to automatically assign members who do not or cannot choose a plan.) Having low rates increases a plan's chances for receiving auto-assignments. It appears that MHP set rates low in order to receive more automatically assigned members. The plan's desire to attract members via the automatic assignment may be due to its historical difficulty in attracting members who can exercise choice.

Health plan members may annually choose to stay with or leave their present plan. AHCCCS reports show that MHP lost more members than the other AHCCCS plans when members exercised their choice to change plans prior to January 1999.

Recommendation

MHP should balance its practice of setting lower rates, to increase enrollment, with the need for adequate margins to ensure financial viability of the plan.

Issue 4 Non-Contracted Providers

Summary

Our review of six months of MHP medical claims expenses showed that MHP is utilizing a significant number (33%) of non-contracted providers, which negates some of the advantages of using contracted providers. MHP should implement procedures to increase its members' usage of County facilities, or other contracted providers, in order to reduce its financial risk.

Provider Types

Health plans develop their provider networks in a manner that decreases costs. According to industry experts, health plans can decrease financial risk (costs) by using contracted or capitated (fixed fee payments per member per month) provider contracts.

MHP pays providers according to the following arrangements:

- Capitated: MHP pays providers a fixed fee per member per month
- Fee for Service (FFS)
 - ⇒ Contracted FFS (fees are usually less than AHCCCS-set fees)
 - ⇒ Non-contracted FFS (normally the most expensive category, providers charge AHCCCS set fees)

MHP encounter and claim data for 7/1/99 - 12/31/99 showed that:

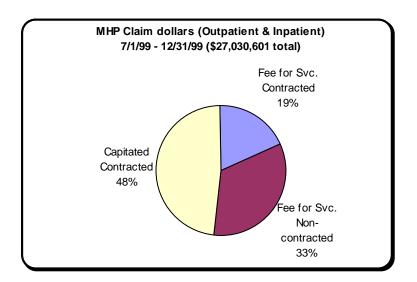
- only 48 percent of claim dollars were paid to capitated providers
- 33 percent of claim dollars were paid to FFS non-contracted providers
- 19 percent of claim dollars were paid to FFS contracted providers.

The information above is charted on the following page.

Inpatient versus Outpatient Analysis:

The encounter and claim data also showed:

- 51 percent of inpatient claim dollars were paid to capitated providers
- 45 percent of outpatient claim dollars were paid to capitated providers.



AHCCCS members are more likely to choose a health plan if they like the plan's provider locations (service availability). Health plans need a large provider network to accommodate AHCCCS' provider proximity requirements and members' location preferences. MHP could reduce its financial risk (costs) by utilizing a higher percentage of capitated or contracted providers.

Recommendation

MHP should take steps to increase its members' usage of County facilities, or other contracted providers, and rely less on outside providers in order to reduce its financial risk.

APPENDIX

MHP 10-Year Enrollment Trend

Auditor General report data (FY90-FY99) show a ten-year MHP enrollment trend:

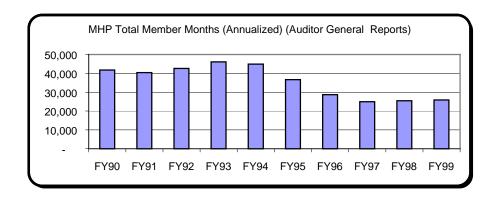


Table A-1 shows the six Maricopa County AHCCCS Acute health plans and their respective enrollment 1994-2000.

	TABLE	A-1 Ma	aricopa (County A	cute AH	CCCS Po	pulation		
Date	Mercy Care	МНР	Phx. HP		APIPA	CIGNA	Now defunct plans	Total County	MHP's 5 competitor totals
Dec-94	45,965	35,148	22,687	14,342	57,091	10,996	25,119	211,348	151,081
Dec-95	41,612	26,775	19,995	21,294	47,977	18,648	22,696	198,997	149,526
Dec-96	41,440	24,108	21,660	23,318	46,107	21,121	21,962	199,716	153,646
Dec-97	43,804	23,611	30,156	22,555	45,650	24,205	0	189,981	166,370
Dec-98	42,384	22,949	29,400	21,602	42,376	21,175	0	179,886	156,937
May-99	44,554	23,212	30,681	21,288	43,683	22,305	0	185,723	162,511
May-00	46,881	26,189	35,146	24,814	51,775	29,124	0	213,929	187,740
1994-99 #Loss/Gain	-1,411	-11,936	7,994	6,946	-13,408	11,309		-25,625	11,430
1994-99 % Gain/(Loss)	-3%	-34%	35%	48%	-23%	103%		-12%	8%
1994-99 % of total County loss	6%	47%	-31%	-27%	52%	-44%		100%	0%
99 to '00 increases	5%	13%	15%	17%	19%	31%		15.2%	15.5%
1994-2000 # Loss/Gain	916	-8,959	12,459	10,472	-5,316	18,128			36,659
1994-2000 % Loss/Gain	2%	-25%	55%	73%	-9%	165%			24%

Note: CIGNA entered the market later than the other plans shown, so its growth was larger.

Table A-2 shows the six Maricopa County AHCCCS acute plans market share positions 1994-2000:

TABLE A-2 Maricopa County AHCCCS Acute Market Share 1994-2000										
Date	Mercy	MHP	Phx. HP	Hlth Choice	APIPA	CIGNA	Ave. Market Share of other 5 plans			
Dec-94	22%	16.6%	11%	7%	27%	5%	14%			
Dec-95	21%	13.5%	10%	11%	24%	9%	15%			
Dec-96	21%	12.1%	11%	12%	23%	11%	15%			
Dec-97	23%	12.4%	16%	12%	24%	13%	18%			
Dec-98	24%	12.8%	16%	12%	24%	12%	17%			
May-99	24%	12.5%	17%	11%	24%	12%	18%			
May-00	22%	12.2%	16%	12%	24%	14%	18%			
Mkt Share change	0%	-4.4%	6%	5%	-3%	8%	3%			

Table A-3 shows KidsCare Enrollment Jan. 1999 to April 2000.

TABLE A-3 KidsCare Enrollment and Market Share Shown By Plan										
	Jan-99	Jan-99	Nov-99	Nov. 99	Apr-00	Apr-00				
APIPA	579	24%	2,685	25%	3,670	24%				
Cigna	357	15%	1,884	17%	2,733	18%				
Health Choice	251	10%	964	9%	1,319	9%				
MHP	250	10%	1,137	10%	1,517	10%				
Mercy Care Plan	601	24%	2,227	20%	3,113	21%				
Phoenix Health Plan	416	17%	1,969	18%	2,636	18%				
Total	2,454	100%	10,866	100%	14,988	100%				

Table A-4 shows the six plans' rates with the rates highlighted in red that correspond to categories showing FY99 losses:

TABLE A-4 AHCCCS 10/99 ACUTE CARE RATES FOR EACH HEALTH PLAN													
Oct-99	TANF <1	TANF 1-13	TANF 14- 44F	TANF 14- 44M	TANF 45+	SSI w/M	SSI w/o	MN/MI w/	SOBRA	SOBRA KICK (incl. ELIC & EAC)	KidsCare 1 - 13 M/F	KidsCare 14 - 18 F	KidsCare 14 - 18 M
AZ Physicians IPA	327.01	68.89	111.75	96.55	228.04	152.07	333.10	506.65	21.30	5379.60	71.96	139.51	80.25
CIGNA Community Choice	344.21	71.09	113.00	97.94	223.51	156.69	346.92	540.76	19.68	5298.72	72.23	140.17	81.01
Health Choice AZ	325.49	64.40	98.84	91.64	223.13	153.93	324.90	516.44	19.68	5241.86	72.23	140.17	81.01
Maricopa Health Plan	327.00	64.18	98.08	88.70	231.30	150.50	327.04	504.83	21.02	5280.26	71.96	139.51	80.25
Mercy Care Plan	316.99	66.92	109.08	88.70	232.52	159.48	322.34	504.83	19.68	5241.86	71.96	139.51	80.25
Phoenix Health Plan	328.03	64.40	103.83	89.68	223.13	163.59	324.90	521.58	19.68	5241.86	72.23	140.17	81.01

Contract year 1999 enrollment net changes are shown in Table A-5. MHP sustained the largest losses (1091 members):

TABLE A-5 Contract Year 1999 Annual Enrollment Choice Activity									
	1 st Qtr.	2nd Qtr.	3 rd Qtr.	4th Qtr.					
	Total	Total	Total	Total	YTD				
APIPA	131	66	142	279	618				
CIGNA	393	240	142	365	1140				
Health Choice	-282	-170	-98	-170	-720				
MHP	-440	-264	-169	-218	-1091				
Mercy Care	266	129	22	-258	159				
Phx. HP	-46	5	-30	20	-51				

Maricopa Health Plan - Financial Summary (Comprehensive Annual Financial Reports)

Table A-6		Comprehensive Annual Financial Reports									
	FY'94	FY'95	FY'96	FY'97	FY'98	FY'99					
Total Operating Revenue	\$90,591,113	\$73,445,034	\$60,595,539	\$54,993,966	\$57,186,336	\$64,235,678					
Interest Income	\$1,215,285	\$1,672,395	\$500,079	\$427,567	\$524,576	\$965,218					
Personal Services Expenses			\$2,748,043	\$649,665	\$1,599,631	\$1,802,879					
Medical Expenses		\$43,652,439	\$50,960,130	\$50,585,667	\$46,868,663	\$58,974,815					
Total Operating Expenses	\$91,007,193	\$78,027,742	\$53,708,173	\$51,235,332	\$48,468,294	\$60,777,694					
Operating Income/ (Loss)	\$(416,080)	(\$4,582,018)	\$4,660,675	\$81,004	\$6,659,891	\$1,828,506					
Unreserved Fund Equity	\$4,385,106	\$1,475,483	\$5,959,850	\$6,051,883	\$13,208,272	\$16,592,075					
Members	35,100	26,800	24,100	23,600	23,000	23,200					